

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JESSICA HODGES, as natural guardian of)
minor children, LMC and DLC; and)
ESTATE OF LEE MICHAEL)
CREELY by and through)
Warren Ratchford, Esq. its Administrator,)

Plaintiffs,)

vs.)

Case Number: 4:22-cv-00067

CHATHAM COUNTY, GEORGIA;)
CORRECTHEALTH LLC;)
CORRECTHEALTH CHATHAM, LLC;)
CARLO MUSSO, MD; KAREN)
FORCHETTE; ALFRED NEVELS;)
SELENA CARDONA;)
TEANNA FRANCES-HENDERSON;)
TERENCE JACKSON; DON WHITE;)
KARLOS MANNING;)
YVETTE BETHEL-QUINNEY;)
LOWRETTA FLORENCE;)
AMBER ANDERSON;)
JACKIE HARNED; SUSAN RIVERA;)
and LOUKISHA ROBERTS,)

Defendants.)

DISCLOSURE STATEMENT
S.D. Ga. LR 7.1.1

The undersigned, counsel of record for Chatham County, Georgia, Alfred
Nevels, Selena Cardona, Teanna Frances-Henderson, Terence Jackson, Don White,

Karlos Manning and Yvette Bethel-Quinney (“County Defendants”), certifies that the following is a full and complete list of the parties in this action

<u>Name:</u>	<u>Identification & Relationship</u>
Jessica Hodges, as natural guardian of minor children, LMC and DLC	Plaintiff
Estate of Lee Michael Creely, through Warren Ratchford, Esq. its Administrator	Plaintiff
CorrectHealth, LLC	Defendant
CorectHealth Chatham, LLC	Defendant
Carlo Musso, MD	Defendant
Karen Forchette	Defendant
Lowretta Florence	Defendant
Amber Anderson	Defendant
Jackie Harned	Defendant
Susan Rivera	Defendant
Loukisha Roberts	Defendant
Chatham County, Georgia	Defendant
Alfred Nevels	Defendant
Selena Cardona	Defendant
Teanna Frances-Henderson	Defendant
Terence Jackson	Defendant

Don White	Defendant
Karlos Manning	Defendant
Yvette Bethel-Quinney	Defendant

The undersigned further certifies that the following is a full and complete list of officers, directors, or trustees of the above-identified parties:

<u>Name:</u>	<u>Identification & Relationship</u>
--------------	--

None known to County Defendants

The undersigned further certifies that the following is a full and complete list of other persons, firms, partnerships, corporations, or organizations that have a financial interest in, or another interest which could be substantially affected by, the outcome of this case (including a relationship as a parent or holding company or any publicly-held corporation that holds 10% or more of a party's stock):

<u>Name:</u>	<u>Identification & Relationship</u>
--------------	--

William R. Claiborne, Esq.	Counsel for Plaintiff
David J. Utter, Esq.	Counsel for Plaintiff
Michael D. Flint, Esq.	Counsel for Defendant Loukisha Roberts
Mary Ellen A. Lighthiser, Esq.	Counsel for Defendant Loukisha Roberts
John A. Christy, Esq.	Counsel for Defendant Loukisha Roberts
Carlton E. Joyce	Counsel for Defendants CorrectHealth, LLC, CorrectHealth Chatham, LLC, Carlo Musso, MD; Karen Forchette; Lowretta Florence; Amber Anderson; Jacqueline

(Jackie) Harned; and Susan Rivera

Lucas D. Bradley

Counsel for Defendants CorrectHealth, LLC, CorrectHealth Chatham, LLC, Carlo Musso, MD; Karen Forchette; Lowretta Florence; Amber Anderson; Jacqueline (Jackie) Harned; and Susan Rivera

R. Jonathan Hart

Counsel for Defendants Chatham County, Georgia, Alfred Nevels, Selena Cardona, Teanna Frances-Henderson, Terence Jackson, Don White, Karlos Manning and Yvette Bethel-Quinney

Andre Pretorius

Counsel for Defendants Chatham County, Georgia, Alfred Nevels, Selena Cardona, Teanna Frances-Henderson, Terence Jackson, Don White, Karlos Manning and Yvette Bethel-Quinney

This 1st day of April, 2022.

/s/ R. Jonathan Hart

R. Jonathan Hart

Georgia Bar No. 333692

Andre Pretorius

Georgia Bar No. 298154

*Attorney for Chatham County, Georgia;
Alfred Nevels, Selena Cardona, Teanna
Frances-Henderson, Terence Jackson, Don
White, Karlos Manning and Yvette Bethel-
Quinney*

P.O. Box 8161

Savannah, GA 31412

(912) 652-7881

Email: rjhart@chathamcounty.org

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

JESSICA HODGES, as natural guardian of)
minor children, LMC and DLC; and)
ESTATE OF LEE MICHAEL)
CREELY by and through)
Warren Ratchford, Esq. its Administrator,)

Plaintiffs,)

vs.)

Case Number: 4:22-cv-00067

CHATHAM COUNTY, GEORGIA;)
CORRECTHEALTH LLC;)
CORRECTHEALTH CHATHAM, LLC;)
CARLO MUSSO, MD; KAREN)
FORCHETTE; ALFRED NEVELS;)
SELENA CARDONA;)
TEANNA FRANCES-HENDERSON;)
TERENCE JACKSON; DON WHITE;)
KARLOS MANNING;)
YVETTE BETHEL-QUINNEY;)
LOWRETTA FLORENCE;)
AMBER ANDERSON;)
JACKIE HARNED; SUSAN RIVERA;)
and LOUKISHA ROBERTS,)

Defendants.)

CERTIFICATE OF SERVICE

I, R. Jonathan Hart, hereby certify that on this day, I served DISCLOSURE
STATEMENT S.D. Ga. LR 7.1.1 on all counsel of record via the Court's CM/ECF
System as follows:

William R. Claiborne, Esq.
David J. Utter, Esq.
The Claiborne Firm, P.C.
410 East Bay Street
Savannah, Georgia 31401
will@claibornefirm.com
david@claibornefirm.com

Michael D. Flint, Esq.
Mary Ellen A. Lighthiser, Esq.
John A. Christy, Esq.
Schreeder, Wheeler & Flint, LLP
1100 Peachtree Street N.E., Suite 800
Atlanta, Georgia 30309-4516
mflint@swflfp.com
mlighthiser@swflfp.com
jchristy@swflfp.com

Carlton E. Joyce
Bouhan Falligant, LLP
Post Office Box 2139
Savannah, Georgia 31402
cejoyce@bouhan.com
ldbradley@bouhan.com
State Bar of Georgia No. 405515

This 1st day of April, 2022.

/s/ R. Jonathan Hart
R. Jonathan Hart
Georgia Bar No. 333692
*Attorney for Chatham County, Georgia;
Alfred Nevels, Selena Cardona, Teanna
Frances-Henderson, Terence Jackson, Don
White, Karlos Manning and Yvette Bethel-
Quinney*

P.O. Box 8161
Savannah, GA 31412
(912) 652-7881
Email: rjhart@chathamcounty.org